

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

The Honorable Barbara J. Houser (Ret.), in her
Capacity as Trustee of the BSA Settlement
Trust,

Plaintiff,

v.

Allianz Global Risks US Insurance Company
et al.,

Defendants.

CIVIL ACTION NO. 3:23-cv-01592-S

**UNOPPOSED MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE
RESPOND TO THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), the undersigned Defendants (the “Movants”) move the Court for an extension of time, until September 29, 2023, to file their answer, motion, or first responsive pleading to Plaintiff’s Complaint (the “Complaint”) filed on July 17, 2023 in the United States District Court for the Northern District of Texas, Dallas Division. ECF No. 1. Plaintiff does not oppose this motion.

PARTIES TO THIS MOTION

The Movants are made up of the following 53 insurers named as Defendants in the Complaint:

- Allianz Global Risks US Insurance Company
- Allstate Insurance Company
- American Casualty Company of Reading, Pennsylvania
- American Home Assurance Company
- Argonaut Insurance Company

- Arrowood Indemnity Company
- Aspen Specialty Insurance Company
- Axis Specialty Insurance Company
- Axis Surplus Insurance Company
- Brighthouse Life Insurance Company f/k/a Travelers Insurance Company
- Catlin Specialty Insurance Company
- Charter Oak Fire Insurance Company
- CNA Financial Corporation
- Colony Insurance Company
- Columbia Casualty Company
- Continental Casualty Company
- The Continental Insurance Company
- Consolidated National Insurance Company
- Endurance American Specialty Insurance Company
- Endurance American Insurance Company
- Everest National Insurance Company
- Evanston Insurance Company
- Fireman's Fund Insurance Company
- First Insurance Company of Hawaii, LTD.
- Gemini Insurance Company
- General Star Indemnity Company
- Great American Assurance Company (f/k/a Agricultural Insurance Company)
- Great American E&S Insurance Company (f/k/a Great American E&S Insurance Company)
- Great American Insurance Company

- Indian Harbor Insurance Company
- The Insurance Company of the State of Pennsylvania
- Interstate Fire & Casualty Company
- Jefferson Insurance Company
- Lexington Insurance Company
- Munich Reinsurance America Inc., formerly known as American Re-Insurance Company
- National Fire Insurance Company of Hartford
- National Union Fire Insurance Company of Pittsburgh, Pa.
- National Surety Corporation
- Nationwide Affinity Insurance Company of America
- Nationwide Mutual Insurance Company
- New Hampshire Insurance Company
- Old Republic Insurance Company
- Scottsdale Insurance Company
- St. Paul Fire and Marine Insurance Company f/k/a St. Paul Insurance Company of Illinois
- St. Paul Mercury Insurance Company
- St. Paul Surplus Lines Insurance Company
- Travelers Casualty and Surety Company f/k/a Aetna Casualty and Surety Company
- The Travelers Companies, Inc. f/k/a Travelers and Phoenix of Hartford Insurance Companies
- The Travelers Indemnity Company f/k/a Gulf Insurance Company
- United States Fidelity and Guaranty Company f/k/a United States Fidelity & Warranty Company
- Swiss Re Corporate Solutions Capacity Insurance Corporation (formerly known as, or otherwise responsible for the liability of, First Specialty Insurance Corporation)

- Wausau General Insurance Company
- Westport Insurance Corporation

GOOD CAUSE EXISTS FOR THE EXTENSION

“When an act may or must be done within a specified time, the court may, for good cause, extend the time with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.” Fed. R. Civ. P. 6(b)(1)(A). Good cause exists for this extension to answer or otherwise respond to the Complaint. Beyond affording the Movants adequate time to respond to the Complaint, the requested extension will align their response dates, enhancing efficiency and order in this case.

The Movants understand that additional Defendants will file similar unopposed motions for an extension of time to respond, and absent special circumstances will request the same response date of September 29, 2023.

The Movants therefore request, and Plaintiff does not oppose, an extension of time to file their answer, motion, or first responsive pleadings to September 29, 2023. The Movants have not previously requested an extension of time and the granting of this relief will not unduly delay this proceeding or cause undue hardship. This motion is made in good faith and for no dilatory purpose. Therefore, good cause exists for this extension.

For the foregoing reasons and upon this showing of good cause, Movants respectfully request that the Court grant this unopposed motion for extension of time to answer or otherwise respond to the Complaint and enter an order extending the time to file an answer, motion, or other responsive pleading to September 29, 2023.

Dated: August 22, 2023

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I certify that the parties have conferred regarding this motion in accordance with Local Rule 7.1 and this motion is unopposed.

/s/ Betty X. Yang

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been served upon counsel of record for Plaintiff via ECF on this 22nd day of August 2023.

/s/ Betty X. Yang